

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Case No. 20-00325 (SWD)

INTERLOGIC OUTSOURCING, INC.,
IOI PAYROLL SERVICES, INC., IOI
WEST, INC., LAKEVIEW HOLDINGS,
INC., LAKEVIEW TECHNOLOGY,
INC., MODEARN, INC., and TIMEPLUS
SYSTEMS LLC,¹

Chapter 11

(Jointly Administered)

Hon. Scott W. Dales

Debtors.

_____ /

ONESOURCE VIRTUAL, INC.

Plaintiff,

Adv. Pro. No. 20-80109 (SWD)

v.

INTERLOGIC OUTSOURCING, INC.,
AND PRIMEPAY, LLC

Defendants.

_____ /

DISCOVERY PLAN

Pursuant to the Court's Order dated December 22, 2020 [ECF Doc. # 14] and in accordance with Fed. R. Bankr. P. 7026, the parties submit the following Discovery Plan.

1. The initial disclosures required by Fed. R. Civ. P. 26(a) will be made on or before February 25, 2021.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Interlogic Outsourcing, Inc. (1273); IOI Payroll Services, Inc. (1202); TimePlus Systems, LLC (9477); IOI West, Inc. (1405); Lakeview Technology, Inc. (1451); Lakeview Holdings, Inc. (7589); and ModEarn, Inc. (3473). The location of the Debtors' headquarters is: 1710 Leer Drive, Elkhart, Indiana 46514.

2. Discovery Plan. The parties jointly propose to the Court the following discovery plan:

- a. All fact discovery commenced in time to be completed by May 18, 2021.
- b. Maximum of 10 interrogatories by each party to any other party.
- c. Maximum of 20 request for admission by each party to any other party.
- d. Maximum of 20 requests for production by each party to any other party.
- e. Maximum of 5 depositions by Plaintiff and 8 by Defendants.
- f. Each deposition [other than that of corporate representatives of the parties] limited to maximum of 4 hours unless extended by agreement of the parties.
- g. Reports from retained experts under Fed. R. Civ. P. 26(a)(2) due May 3, 2021. All expert discovery will be completed by May 21, 2021.

3. Other Agreed Upon Items.

- a. Plaintiff should be allowed until March 18, 2021 to join additional parties and until April 20, 2021 to amend the pleadings.
- b. Defendants should be allowed until March 18, 2021 to join additional parties and until April 20, 2021 to amend the pleadings.
- c. All potentially dispositive motions should be filed within the two week of the close of all discovery (i.e., by June 4, 2021).
- d. The proceeding should be ready for trial by July 19, 2021. The trial is expected to take approximately 1 trial day.

Date: February 11, 2021

Respectfully submitted,

/s/ Michael C. Whalen

Steven L. Rayman
RAYMAN & KNIGHT
141 East Michigan Avenue Suite 301
Kalamazoo, Michigan 49007
Telephone: (269) 345-5156
Facsimile: (269) 345-5161

- and -

Matthew M. Murphy (*pro hac vice*)
Nathan S. Gimpel (*pro hac vice*)
Michael C. Whalen (*pro hac vice*)
Matthew Smart (*pro hac vice*)
PAUL HASTINGS LLP
71 South Wacker Drive, Suite 4500
Chicago, Illinois 60606
Telephone: (312) 499-6000
Facsimile: (312) 499-6100

Attorneys for Interlogic Outsourcing, Inc.

/s/ Darius C. Gambino

Sara E.D. Fazio
KREIS, ENDERLE, HUDGINS & BORSOS, PC
40 Pearl St. NW, 5th Floor
Grand Rapids, MI 49503
Telephone: (616) 254-8400
Email: safazio@kreisenderle.com

- and -

Darius C. Gambino (*pro hac vice*)
PA Attorney No. 83496
SAUL EWING ARNSTEIN & LEHR LLP
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186
Telephone: (215) 972-7173
Email: darius.gambino@saul.com

Attorneys for Defendant PrimePay, LLC

/s/ Jamil N. Alibhai

John R. Humphrey (*pro hac vice*)
Indiana Attorney No. 21678-49
TAFT STETTINIUS & HOLLISTER LLP
One Indiana Square, Suite 3500
Indianapolis, IN 46204-2023
Telephone: (317) 713-3500
Email: jhumphrey@taftlaw.com

Jamil N. Alibhai (*pro hac vice*)
Texas State Bar No. 00793248
MUNSCH HARDT KOPF & HARR, P.C.
500 N. Akard Street, Suite 3800
Dallas, Texas 75201-6659
Tel: (214) 855-7500
Fax: (214) 855-7584
Email: jalibhai@munsch.com

Attorneys for Plaintiff OneSource Virtual, Inc.